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BY ECF

The Honorable Joel A. Pisano
Clarkson S. Fisher Building & United States Courthouse
402 East State Street
Trenton, NJ 08608

Re: *Timothy Davidson v. BlackRock Advisors, LLC, 3:14-cv-02863-JAP-DEA*
Clancy v. BlackRock Investment Management, LLC, 3:14-cv-01165-JAP-DEA
Foote v. BlackRock Advisors, LLC, 3:14-cv-01991-JAP-DEA
Fox v. BlackRock Advisors, LLC, 3:14-cv-02097-JAP-DEA

Dear Judge Pisano:

We represent Plaintiff Timothy Davidson¹ in the action captioned *Timothy Davidson v. BlackRock Advisors, LLC, 3:14-cv-02863-JAP-DEA* (the “*Davidson Action*”), filed earlier today. The *Davidson Action* is related to the following actions pending before the Court: (i) *Clancy v. BlackRock Investment Management, LLC, 3:14-cv-01165-JAP-DEA* (the “*Clancy Action*”), (ii) *Foote v. BlackRock Advisors, LLC, 3:14-cv-01991-JAP-DEA* (the “*Foote Action*”) and (iii) *Fox v. BlackRock Advisors, LLC, No. 3:14-cv-02097-JAP-DEA* (the “*Fox Action*”).

We understand that the parties to the *Clancy*, *Foote* and *Fox* Actions have filed a stipulation and proposed order which seek to consolidate those actions and appoint a lead and local counsel (the “Lead Counsel Stipulation”). Given that Plaintiff Davidson will be filing a motion later this week seeking, *inter alia*, to consolidate the captioned actions and the appointment of Davidson’s counsel as lead and local counsel, he respectfully requests that the Court delay signing the Lead Counsel Stipulation until his motion can be considered by the Court.

Thank you for your consideration.

Respectfully submitted,
s/ Richard B. Brualdi
Richard B. Brualdi

¹ Mr. Davidson, in his capacity as trustee on behalf of the West Putnam Avenue Trust, owns shares of BlackRock Global Allocation Fund, Inc. (the entity whose interests each of the captioned actions seeks to protect) valued at approximately \$1,031,029.66, which appears to make him the largest investor to file suit. See *In re Merck & Co. Sec. Litig.*, 432 F.3d 261, 266 (3d Cir. 2005) (noting that the theory underlying the PSLRA’s requirement that courts appoint as lead plaintiff the plaintiff with the most money at stake” was that “plaintiffs with the largest financial interests, typically institutional investors, will best represent the plaintiff class’s interests and will choose the best counsel”)